

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

In Re: : Chapter 7
Vinesia L. Mapp : Case No. 21-10065
: Judge BUCHANAN
:
:

MOTION TO REDEEM

Now comes the Debtor(s) by and through counsel, and moves the court pursuant to 11 U.S.C. and Bankruptcy Rule 6008 for a Redemption Order on the following grounds:

Creditor:

Bridgecrest Acceptance Corp.
Po Box 29018
Phoenix AZ 85038-0000

1. The item to be redeemed is tangible personal property described below and is intended primarily for personal, family, or household use by the debtor:

Year: 2012 Make: Hyundai Model: Veracruz

VIN # KM8NUDCC9CU186458

2. The interest of the Debtor(s) in such property has been abandoned by the estate and the debt (which is secured by said property to the extent of the allowed secured claim of the Creditor) is a dischargeable consumer debt.

3. The allowed secured claim of said Creditor for purposes of redemption, the “redemption value”, should be determined to be not more than \$3,000.00. A copy of an Edmunds Vehicle Valuation is attached hereto as Exhibit “A”. Valuation of \$3,000.00 was determined given the poor condition and necessary repairs needed to the vehicle.

4. Arrangements have been made by the Debtor(s) to pay to the said Creditor up to the aforesaid amount in a lump sum should this motion be granted.

WHEREFORE, the Debtor(s) request(s) the Court to order the said Creditor to accept from the Debtor(s) the lump sum payment of the redemption value and release their lien of record. In the event the said Creditor objects to this motion, the Debtor(s) requests the Court to determine the value of the property as of the time of the hearing on such objection.

Respectfully submitted,

/s/ Thomas M. Fesenmyer

Thomas M. Fesenmyer (0073901)
Attorney for Debtor(s)
120 W. Second St., Suite 333
Dayton, OH 45402
937.222-.7472
614.228.3882 *fax*
e-mail: tom@fcwlegal.com

NOTICE OF MOTION TO REDEEM

Notice is hereby given that Debtor(s) has filed the following papers with the Court:
Motion to Redeem.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to grant the relief sought, or if you want the Court to consider your views thereon, then on or before twenty-one (21) days from the date of service of this Notice, you or your attorney must:

File with the Court a written request for a hearing along with a written response or an answer explaining your position. This pleading must be filed at Clerk of Courts, United States Bankruptcy Court, Atrium Two, Suite 800, 221 East Fourth Street, Cincinnati, Ohio 45202. If you mail your request and response to the Court for filing, you must mail it early enough so the Court will receive it on or before the date stated above. The Court will send out a Notice of hearing. You must also mail a copy to:

Thomas M. Fesenmyer, Esq.
120 W. Second St., Suite 333
Dayton, OH 45402

Office of the US Trustee
550 Main St., Room 4-812
Cincinnati, OH 45202

Eileen K. Field, Trustee
3991 Hamilton Middletown Rd., Unit U
Hamilton, OH 45011

Vinesia L. Mapp
4515 Lucerne Ave.
Cincinnati, OH 45227

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the Motion and may enter an order granting that relief pursuant to the provisions of Local Bankruptcy Rule 9013.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing MOTION TO REDEEM was served electronically on the date of filing through the Court's ECF System on all ECF participants registered in this case at the email address registered with the Court and by ordinary U.S. mail, postage prepaid, on March 16, 2021:

Debtor:

Vinesia L. Mapp
4515 Lucerne Ave.
Cincinnati, OH 45227

Creditor:

Bridgecrest Acceptance Corp.
Po Box 29018
Phoenix AZ 85038-0000

Bridgecrest Acceptance Corp.
Attn: CEO Don Reese
4020 East Indian School Rd.
Phoenix, AZ 85018

Bridgecrest Acceptance Corporation
Attn: CEO Don Reese
7300 E Hampton Ave
Ste 101
Mesa, AZ 85209

CORPORATION SERVICE COMPANY
Registered Agent for Bridgecrest Acceptance Corp.
50 WEST BROAD STREET, SUITE 1330
COLUMBUS OH 85209

/s/ Thomas M. Fesenmyer
Thomas M. Fesenmyer (0073901)
Attorney for Debtor(s)
120 W. Second St., Suite 333
Dayton, OH 45402
937.222.7472
614.228.3882 fax
e-mail: tom@fcwlegal.com

Value Based on Condition:**Your appraisal
Rough**

National Base Price

\$3,743

Color Adjustment

\$1

Regional Adjustment

\$29

Mileage Adjustment

\$10

Condition Adjustment

-\$458

Rough Condition Value